

DM-7J

January 8, 2003

RE: Lafarge Corporation  
RCRA Final Decision  
OHD 987 048 733

Dear Interested Party:

On December 23, 2002, the United States Environmental Protection Agency (U.S. EPA), Region 5, issued the Resource Conservation and Recovery Act (RCRA) Hazardous Waste permit modification to the Lafarge Corporation facility in Paulding, Ohio. The modification addressed corrective action requirements under Section VIII of the permit.

Enclosed please find a copy of the final RCRA determination on the modification. The public notice was issued on October 9, 2002, in accordance with Title 40, Code of Federal Regulations, Part 124. The Agency received no comments during the comment period, which commenced on October 10, 2002, and ended on November 25, 2002.

Please contact Mr. Daniel Patulski at (312) 886-0656, if you have any questions or need further assistance regarding this decision. You may also find information on this permit modification on the Region 5 web site (address: <http://www.epa.gov/reg5rcra/wptdiv/permits/index.htm>).

Sincerely,

/s/

Jane E. Ratcliffe, Ph.D., Chief  
Information Management Section

Enclosure

**RESPONSE TO COMMENTS  
REGARDING THE ISSUANCE OF THE  
RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)  
HAZARDOUS WASTE MANAGEMENT PERMIT MODIFICATION  
TO  
LAFARGE CORPORATION  
11435 COUNTY ROAD 176  
PAULDING, OHIO 45879-0160  
OHD 987 048 733**

**INTRODUCTION**

This response is issued pursuant to Title 40 of the Code of Federal Regulations Section 124.17, which requires that when any final permit modification decision is issued, the United States Environmental Protection Agency (U.S. EPA) shall describe and respond to all significant comments submitted in writing during the public comment period or raised during any public hearing held by the U.S. EPA; specify which provisions of the draft permit modification decision have been changed and the reason for the change; include in the administrative record for the final permit modification decision any documents cited in the response to comments; and make the response to comments available to the public.

The public comment period commenced on October 10, 2002, with a public notice in the Paulding Progress newspaper as well as a radio announcement on DW-FM in Defiance, Ohio. The public comment period ended on November 25, 2002.

**COMMENTS AND RESPONSES:**

No comments were received during the public comment period. However, two changes were made to the signature page of the permit:

1. Under the Effective Date, the word “modified” was added to, “This permit will remain in...” to read “This **modified** permit will remain in...”
2. The signature line was changed from Robert Springer, Director to “**Phyllis A. Reed, Acting Director.**”

**DETERMINATION:**

Based upon the information made available to the U.S. EPA through the modification request and public comment process, the U.S. EPA has determined that this permit modification contains such terms and conditions as are necessary to protect human health and the environment, and thereby issues the permit modification to the Permittee.

STATEMENT OF BASIS FOR  
NO FURTHER ACTION DETERMINATION  
AT  
LAFARGE CORPORATION  
PAULDING, OHIO

## **INTRODUCTION**

This Statement of Basis (SB) for the Lafarge Corporation (LFC) facility in Paulding, Ohio, is being issued by the United States Environmental Protection Agency (U.S. EPA) to fulfill part of its public participation responsibilities under the Resource Conservation and Recovery Act (RCRA). The SB explains the reasons for the proposed determination of No Further Action that are part of the corrective action obligations under the existing RCRA permit for the facility.

This SB summarizes information that can be found in greater detail in the RCRA Facility Investigation (RFI) Report and the Groundwater Monitoring Program Report, 1996 as well as other documents contained in the administrative record for the LFC facility. The U.S. EPA encourages the public to review the above documents in order to gain a more comprehensive understanding of the LFC facility and the RCRA activities that have been conducted there.

The U.S. EPA invites public comment on the no further action determination and will make a final decision regarding its proposed action only after the public comment period has ended and the information submitted during this time has been reviewed and responded to by the U.S. EPA. The public is encouraged to become involved in the decision process by reviewing the documents contained in the administrative record. If a public hearing is requested, the U.S. EPA will inform the public of the time and location of that hearing.

## **FACILITY BACKGROUND**

### Operational History

The Lafarge facility was originally developed in 1951 as a limestone quarrying operation. The construction of a cement plant began in 1954 in the vicinity of the reclaimed on-site quarry. Cement production began in 1956 and a second kiln was added in 1958. The facility was officially named Lafarge Corporation in January 1988.

The LFC facility consists of two properties covering an area of approximately 1300 acres. Systech operates a 12-acre hazardous materials recycling facility which serves to provide an alternative fuel source to LFC. The LFC facility is contiguous to and surrounds the Systech property. In addition,

approximately 240 acres in the northeast corner of the property have been leased to Hanson Aggregates since 1985. Hanson crushes and screens stone which LFC can not use in their cement operations.

LFC produces Portland cement from limestone (mined on the property), clay, sand and iron mixed in two rotary kilns. The kilns produce clinker, which is pulverized into a fine powder and mixed with gypsum to form the final product. The kilns are able to burn a variety of fuels, including coal and a petroleum/coke mixture, but are licensed under the boiler and industrial furnace rule to burn hazardous liquid waste-derived fuel, and do so most of the time. Systech provides the hazardous liquid waste fuel to LFC.

The cement manufacturing process produces clinker, exhaust gases which pass through a baghouse prior to discharge, and cement kiln dust (CKD). Much of the CKD is recycled into the cement manufacturing process, while a portion is placed into an on-site landfill.

### Environmental Assessment

On August 5, 2000, the RCRA permit issued to LFC became effective. This permit allows the facility to burn hazardous waste in its two cement rotary kilns. The two kilns constitute the two regulated units at the site. The permit specifies all of the management requirements for those units. The permit also specifies that corrective action be performed at eight Solid Waste Management Units (SWMUs) based on a RCRA Facility Assessment (RFA) performed at the site in 1992. The U.S. EPA determined that all of these SWMUs required further investigation.

A RCRA Facility Investigation (RFI) was performed at the site in the fall of 2001. Additional data were available from the groundwater monitoring program that was initiated at the site in 1994 to address any potential releases to groundwater originating from the two CKD landfills, in accordance with State requirements. These same groundwater monitoring wells were used for collecting additional data for the RFI. The RFI addressed soil, sediment, surface water and groundwater in assessing the site. The data from the RFI were presented in the RFI Report that was prepared in December 2001. Additional information about the geology/hydrogeology was obtained from a report prepared in 1993. That report provided information about the geology and groundwater conditions under LFC. Groundwater sample data were also provided in the report.

The findings of these investigations have included the following:

- \* Neither volatile nor semi-volatile organic compounds were detected (constituents were below practical quantitation limits) in groundwater, surface water, sediments, and soil samples analyzed at the eight SWMUs.
- \* All metals analyzed were below residential Preliminary Remediation Goals (PRGs) benchmark screening levels for groundwater, surface water, sediments, and soil samples analyzed at the eight SWMUs.

\* The groundwater monitoring program, initiated in 1994 to address groundwater quality, particularly influenced by the CKD landfills, has not shown any evidence of concern from the inorganic and indicator parameters analyzed from the five detection monitoring wells on site.

## **SUMMARY OF FACILITY RISKS**

The data collected and reviewed during the RFI were compared to screening level benchmarks to determine contaminant risks at the facility. The principle benchmark values used were the PRGs. These values focus on common exposure pathways and combine current EPA toxicity values with standard exposure factors to estimate contaminant concentrations in environmental media that are protective of humans, including sensitive groups, over a lifetime of unrestricted use. Non-detection of constituents was based on the laboratory's Practical Quantitation Limits (PQLs).

Based on the data from the RFI, organic constituents were not detected within any media sampled. For naturally occurring constituents (i.e., metals), none were above the PRG's established for the specific metals within any of the media sampled. Based on these results, there were no unacceptable present risks to human health or the environment at the facility. Therefore, a site specific risk assessment was not required.

## **DETERMINATION OF NO FURTHER ACTION**

Based on the above results and review, the U.S. EPA believes that the Permittee has made an acceptable demonstration that there are no releases of hazardous waste(s), including hazardous constituents, from SWMUs at the facility that pose a threat to human health and the environment. However, a determination of no further action will not preclude the Regional Administrator from requiring further investigations, studies or remediation at a later date, if new information, including information obtained during the public comment period, or subsequent analysis indicates that a release or likelihood of a release from a SWMU at the facility is likely to pose a threat to human health or the environment.

## **PUBLIC PARTICIPATION**

The U.S. EPA is soliciting comments from the public on this proposal for No Further Action at the Lafarge facility. The U.S. EPA has scheduled a public comment period of 45 days from October 10, 2002 to November 25, 2002, in order to encourage public participation in the decision process. During the comment period, the U.S. EPA will accept written comments on the proposed action. The public may submit written comments, questions, and request a public hearing at the following address:

Mr. Daniel Patulski  
United States Environmental Protection Agency  
77 West Jackson Boulevard, DW-8J  
Chicago, Illinois 60604

Telephone No.: (312) 886-0656

The administrative record is available for review at the following two locations:

The Paulding County Carnegie Library  
205 S. Main Street  
Paulding, Ohio 45879

and

United States Environmental Protection Agency  
77 West Jackson Boulevard, DW-8J  
Chicago, Illinois 60604  
Attention: Daniel Patulski

After U.S. EPA's consideration of the public comments that are received, the comments will be summarized and responses will be provided in a Response To Comments document. The Response To Comments document will be drafted at the conclusion of the public comment period and will be incorporated into the administrative record.